



March 21, 2019

Mr. Scott Smith  
Deputy Director  
Wyoming Game and Fish Department  
5400 Bishop Blvd.  
Cheyenne, WY 82006

SENT VIA EMAIL TO: [scott.smith1@wyo.gov](mailto:scott.smith1@wyo.gov)

RE: Wyoming Game and Fish Department Ungulate Migration Corridor Strategy

Dear Mr. Smith:

The Wyoming County Commissioners Association (WCCA), Wyoming Association of Conservation Districts (WACD), Wyoming Stock Growers Association (WSGA), Wyoming Wool Growers Association (WWGA), Wyoming Farm Bureau Federation (WFB), Wyoming Mining Association (WMA) and the Petroleum Association of Wyoming (PAW) request that the Wyoming Game and Fish Department (WGFD) suspend the designation of ungulate migration corridors until the oil and gas lease deferral process is clarified and counties and landowners are involved in the development of management strategies.

As local officials, landowners, grazing permittees and energy operators, we strive to balance and respect private property rights, the development of our energy resources, and protection of wildlife. We recognize the value of maintaining the functionality of migration corridors. We are convinced it is possible to promote effective management policies while respecting property rights.

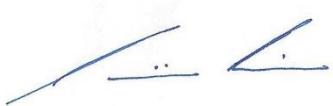
To date, there have been issues with the process the WGFD has used to designate and establish management recommendations for ungulate migration corridors. For example, two of the three corridors formally designated in southwest Wyoming overlie portions of the checkerboard. Based on recommendations of the WGFD, the BLM is deferring leasing of oil and gas parcels using the percentage of the parcel that overlies a migration corridor or its proximity to stopover areas. However, the WGFD is not considering the presence of private surface and/or minerals. As such, we are concerned the WGFD is creating a potential takings of private minerals and forgoing development of federal minerals that may be developed using long laterals which would comingle with other minerals. With an ever-increasing number of ungulate migration corridors under consideration by the WGFD, we request further evaluation of this and other similar issues.

Further, we believe coordination and outreach has been lacking throughout the process to develop a strategy for conserving ungulate migration corridors, including the designation of corridors and recommendations to defer leases. As advocates for private property rights and the involvement of counties in resource management decision-making, we request the WGFD include the local boards of county commissioners, along with all affected landowners, early and throughout the process to designate corridors and the specific management strategies, including lease deferral recommendations, prior to submission to state and federal agencies.

In addition, private landowners and private mineral interest owners are often directly affected by decisions that are made regarding the management of migration corridors on adjacent public and state lands. We urge you to insure that your process provides full opportunity for the input of these affected interests.

We appreciate your thoughtful consideration of our concerns and recommendations regarding this matter. We are confident that protection of ungulate migration corridors can occur in a manner that respects the rights of all parties and supports Wyoming's wildlife.

Sincerely,



Jerimiah Rieman, Executive Director  
Wyoming County Commissioners Association



Jim Magagna, Executive Vice President  
Wyoming Stock Growers Association



Holly L. M. Kennedy  
Field Services and Federal Lands Associate  
Wyoming Farm Bureau Federation



Esther Wagner, Vice President  
Wyoming Petroleum Association



Bobbie Frank, Executive Director  
Wyoming Association of Conservation Districts



Amy Hendrickson, Executive Director  
Wyoming Wool Growers Association



Travis Deti, Executive Director  
Wyoming Mining Association